

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

Civil Action No. 06-726-JJF

CHI MEI OPTOELECTRONICS
CORPORATION, et al.

Defendants.

**PLAINTIFF'S MOTION FOR RULE 11 SANCTIONS
AND SANCTIONS PURSUANT TO 28 U.S.C. § 1927**

Plaintiff LG.Philips LCD Co., Ltd. (“LPL”) respectfully moves this Court for Rule 11 sanctions against Defendant Chi Mei Optoelectronics Corporation (“CMO”) and its attorneys. On December 1, 2006, Plaintiff LG.Philips LCD Co., Ltd. (“LPL”) filed a Complaint for Patent Infringement against CMO and others alleging infringement of three of LPL’s United States patents. On April 6, 2007, CMO filed a Motion to Dismiss for Lack of Personal Jurisdiction and Insufficiency of Service of Process (D.I. 19). After repeated attempts to encourage CMO to withdraw its baseless motion, LPL was forced to respond to CMO’s motion, and on May 22, 2007, LPL filed its opposition brief (D.I. 57.) LPL now seeks sanctions against CMO and its attorneys for the filing by CMO of its frivolous motion to dismiss.

The factual and legal support for this motion are set forth in the accompanying brief, the Declaration of Gaspare J. Bono and the exhibits attached thereto, which have been simultaneously served with this motion.

THE BAYARD FIRM

/s/ Richard D. Kirk (rk0922)

Richard D. Kirk
Ashley B. Stitzer
222 Delaware Avenue, 9th Floor
P.O. Box 25130
Wilmington, DE 19899-5130
(302) 655-5000
rkirk@bayardfirm.com

Attorneys for Plaintiff LG.Philips LCD Co., Ltd.

OF COUNSEL:

Gaspare J. Bono
Song K. Jung
R. Tyler Goodwyn, IV
Lora A. Brzezynski
McKenna Long & Aldridge LLP
1900 K Street, N.W.
Washington, D.C. 20006
(202) 496-7500

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

LG.PHILIPS LCD CO., LTD.,

Plaintiff,

v.

CHI MEI OPTOELECTRONICS
CORPORATION, et al.

Defendants.

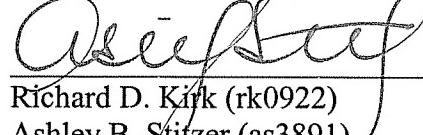
Civil Action No. 06-726 (JJF)

**LOCAL RULE 7.1.1 STATEMENT IN SUPPORT OF PLAINTIFF'S MOTION
FOR RULE 11 SANCTIONS AND SANCTIONS PURSUANT TO 28 U.S.C. §1927**

The undersigned attorney for plaintiff, LG. Philips LCD Co., LTD (“LPL”), hereby states, pursuant to Local Rule 7.1.1, that LPL’s attorneys have made a reasonable effort to reach agreement with opposing counsel on the matters set forth in the Motion for Rule 11 Sanctions and Sanctions Pursuant to 28 U.S.C. §1927 (the “Motion”), as set forth in the accompanying Opening Brief in support of the Motion, but that agreement was not forthcoming.

June 19, 2007

THE BAYARD FIRM



Richard D. Kirk (rk0922)

Ashley B. Stitzer (as3891)

222 Delaware Avenue, Suite 900

Wilmington, DE 19899-5130

(302) 655-5000

rirk@bayardfirm.com

astitzer@bayardfirm.com

Counsel for plaintiff,

LG.Philips LCD Co., Ltd.

CERTIFICATE OF SERVICE

The undersigned counsel certifies that, on June 19, 2007, she served the foregoing documents by email and by hand upon the following counsel:

Edmond D. Johnson
Thomas H. Kovach
Pepper Hamilton LLP
1313 Market Street, Suite 5100
PO Box 1709
Wilmington, DE 19899-1709

Karen L. Pascale
John W. Shaw
Young Conaway Stargatt & Taylor, LLP
The Brandywine Building
1000 West Street, 17th Floor
P.O. Box 391
Wilmington, DE 19899-0391

Philip A. Rovner
Dave E. Moore
Potter Anderson & Corroon LLP
1313 North Market Street
Wilmington, DE 19899-0951

William E. Manning
Jennifer M. Becnel-Guzzo
Buchanan Ingersoll & Rooney
The Brandywine Building
1000 West Street, Suite 1410
Wilmington, DE 19801

The undersigned counsel further certifies that, on June 19, 2007, she served the foregoing documents by email and by U.S. Mail upon the following counsel:

John N. Zarian
Samia McCall
Matthew D. Thayne
J. Walter Sinclair
Stoel Rives LLP
101 S. Capitol Blvd., Suite 1900
Boise, ID 83702

Vincent K. Yip
Peter J. Wied
Jay C. Chiu
Paul, Hastings, Janofsky & Walker LLP
515 South Flower Street
Twenty-Fifth Floor
Los Angeles, CA 90071

Kenneth R. Adamo
Robert C. Kahrl
Arthur P. Licygiewicz
Jones Day
North Point
901 Lakeside Avenue
Cleveland, OH 44114-1190

Bryan J. Sinclair
Karineh Khachatourian
Buchanan Ingersoll & Rooney
333 Twin Dolphin Drive, Suite 700
Redwood Shores, CA 94065-1418

/s/ Ashley B. Stitzer, (as3891)
Ashley B. Stitzer